

TRACI ST. CLAIRE	)	
	)	
Plaintiff,	)	CIVIL ACTION FILE
	)	
v.	)	NO. 1:17-cv-03370-AT-JFK
	)	
DITECH FINANCIAL, LLC,	)	
f/k/a GREEN TREE SERVICING, LLC	)	
	)	
Defendant.	)	
	)	
	)	

In accordance with U.S.D.C. N.D. Ga. Local Rule 83.1E, James W. Hurt, Jr. as counsel for Plaintiff respectfully moves this Court to allow Mr. Hurt to withdraw as counsel for Plaintiff Traci St. Claire. Counsel for Plaintiff further states the following:

The Notice is Of Intent To Withdraw as Counsel was served via electronic mail at [traci@youreunique.net](mailto:traci@youreunique.net) and [tracistclaire@gmail.com](mailto:tracistclaire@gmail.com) on Thursday, July 12, 2018 and by First Class U.S. Mail at the Plaintiff's address of 8390 Emerald Point Lane, Gainesville, Georgia 30506, on Friday July 13, 2018. Said Notice of Intent is attached hereto as Exhibit A.

2.

I, James W. Hurt, Jr., wish to withdraw from further representation of the Plaintiff. Local Rule 83.1E(b)(A).

3.

Pursuant to the State Bar of Georgia Rules of Professional Conduct 1.16(b)(3) and 1.16(b)(5), I am required to move to withdraw if:

- The client insists upon pursuing an objective that the lawyer considers repugnant or imprudent; Rule 1.16(b)(3) and
- The representation will result in an unreasonable financial burden on the lawyer or has been rendered unreasonably difficult by the client. Rule 1.16(b)(5).

4.

Over the course of this litigation, Ms. St. Claire's and my views of a proper outcome in the matter have become increasingly disparate to the point that I cannot proceed with the matter in a manner that approaches Ms. St. Claire's expectations.

Respectfully submitted, this 26<sup>th</sup> day of July, 2018.

**HURT STOLZ, P.C.**

s/. James W. Hurt, Jr.  
By: James W. Hurt, Jr.  
Georgia Bar No.: 380104

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**CERTIFICATE OF SERVICE, FONT AND MARGINS**

I hereby certify that on this day, I electronically filed the foregoing MOTION TO WITHDRAW AS COUNSEL with the Clerk of the Court using the CM/ECF System, which sent notification of such filing to all counsel of record and which sent notification of such filing to the party listed below pursuant to L.R. 5.1(A)(3).

Mark J. Windham  
[mark.windham@troutman.com](mailto:mark.windham@troutman.com)  
Monika V. Scott  
[monika.scott@troutman.com](mailto:monika.scott@troutman.com)

I further certify that I prepared this document in 14 point Times New Roman font and complied with the margin and type requirements of this Court pursuant to L.R. 5.1.

Respectfully submitted, this 26<sup>th</sup> day of July, 2018.

**HURT STOLZ, P.C.**

s/. James W. Hurt, Jr. \_\_\_\_\_  
By: James W. Hurt, Jr.  
Georgia Bar No.: 380104

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